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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 IN RE: UBER TECHNOLOGIES,
12 INC., PASSENGER SEXUAL
ASSAULT LITIGATION

13 This Document Relates to:

14 ALL ACTIONS
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Case No. 3:23-md-03084-CRB

**JOINT STATUS REPORT REGARDING
DEPOSITION SCHEDULING**

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

JOINT STATUS REPORT

In accordance with this Court's January 14, 2025, Order Regarding Joint Letter Addressing Scheduling Depositions (ECF No. 2085), Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, "Defendants") (jointly, "the parties") respectfully submit this Joint Status Report to provide the Court an update on the scheduling of depositions for the 21 witnesses at issue in the parties' January 13, 2025, joint letter and the scheduling of the additional 24 witnesses identified on Plaintiffs' January 7, 2025, list.

The parties met and conferred via a videoconference on January 16, 2025, and again on January 17, 2025. The parties have resolved the outstanding scheduling disputes with respect to the first 21 depositions as follows:

Witness	Deposition Date/Status
Fogg, Chad	February 5
Freivogel, Cory	February 6
Hourdajian, Nairi	February 7
Parker, Kate ¹	February 14
Richter, David	February 24
Joyce, Meghan	February 24
Luu, Jenny	February 27
Whaling, Kayla ²	February 28
Shuping, Valerie	March 6 or 7
Fuldner, Gus	March 10 and 11 (after 11 am)
Lake, Carley	March 20 and 21
Burke, Jordan	March 20
Cinelli, Dennis	March 28
Kaiser, Roger	April 2
Anderson, Brooke	April 3 and 4
Ding, Abbie	April 3 or 4
Hawk, Cassie	April 8
Holt, Rachel	April 9
Henley, Mat	May 6

¹ Ms. Parker is listed in the second wave of 24 dependents.

² Ms. Whaling is listed in the second wave of 24 dependents.

Witness	Deposition Date/Status
Kansal, Sachin	May 15 (placeholder date pending resolution of forthcoming motion for protective order)
Graves, Ryan	Mr. Graves has independent counsel and Defendants' counsel is continuing their efforts to work with Mr. Graves's counsel to obtain placeholder dates for his deposition should any forthcoming motion for a protective order be unsuccessful.
Breedon, Tracey	<p>Defendants provided February 19, 20, 25, 26, and 27 for Ms. Breedon's deposition, none of which worked for Plaintiffs. Plaintiffs offered January 28–31, February 3–7 and 10–11, which did not work for Ms. Breedon.</p> <p>Given the parties were unable to find a mutually agreeable date in February, they have agreed to schedule Ms. Breedon's deposition for a date later in the schedule and Defendants' counsel is working with Ms. Breedon to provide availability.</p>
Chang, Frank	Defendants intend to file a motion for protective order with respect to Mr. Chang's deposition and have proposed either May 8, 9, 28, 29 and 30 as a placeholder date for Mr. Chang's deposition. Plaintiffs have requested April 3–4 and April 8–11 and any other available dates in March and April. Defendants, however, have not yet provided but are working with Mr. Chang to identify earlier availability and will provide earlier deposition dates to Plaintiffs by January 21.

The parties are continuing to discuss the scheduling of depositions, including the scheduling of the second wave of 24 deponents identified on Plaintiff's January 7, 2024 list. The parties have scheduled a video conference for January 23, 2024 at 9:45 a.m. PST and tentatively scheduled an in-person meet and confer on January 24, 2025 following the conclusion of the conference before Judge Breyer to resolve any outstanding issues.

Given the parties have agreed to dates for 18 of the first 21 depositions, as well as two dates for witnesses in Plaintiffs' second list, scheduled eight depositions for the January-February time period set by this Court's order, and have additional meet and confers scheduled for next week, the Parties request that this Court relieve the parties of the requirement to appear in person at Courtroom G on January 21, 2025, beginning at 10:00 a.m.

1 By: /s/ Roopal Luhana

2 ROOPAL P. LUHANA (*Pro Hac Vice*)

3 **CHAFFIN LUHANA LLP**

4 600 Third Avenue, Fl. 12

5 New York, NY 10016

6 Telephone: (888) 480-1123

7 Email: luhana@chaffinluhana.com

8 SARAH R. LONDON (SBN 267083)

9 **LIEFF CABRASER HEIMANN &**

10 **BERNSTEIN**

11 275 Battery Street, Fl. 29

12 San Francisco, CA 94111

13 Telephone: (415) 956-1000

14 Email: slondon@lchb.com

15 RACHEL B. ABRAMS (SBN 209316)

16 **PEIFFER WOLF CARR KANE**

17 **CONWAY & WISE, LLP**

18 555 Montgomery Street, Suite 820

19 San Francisco, CA 94111

20 Telephone: (415) 426-5641

21 Email: rabrams@peifferwolf.com

22 *Co-Lead Counsel for Plaintiffs*

By: /s/ Randall Luskey

RANDALL S. LUSKEY (SBN: 240915)

rluskey@paulweiss.com

PAUL, WEISS, RIFKIND, WHARTON

& GARRISON LLP

535 Mission Street, 24th Floor

San Francisco, CA 94105

Telephone: (628) 432-5100

Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice*)

ratkins@paulweiss.com

CAITLIN E. GRUSAUSKAS (*Pro Hac Vice*)

cgrusauskas@paulweiss.com

ANDREA M. KELLER (*Pro Hac Vice*)

akeller@paulweiss.com

PAUL, WEISS, RIFKIND, WHARTON

& GARRISON LLP

1285 Avenue of the Americas

New York, NY 10019

Telephone: (212) 373-3000

Facsimile: (212) 757-3990

MICHAEL B. SHORTNACY (SBN: 277035)

mshortnacy@shb.com

SHOOK, HARDY & BACON, L.L.P.

2049 Century Park East, Suite 3000

Los Angeles, CA 90067

Telephone: (424) 285-8330

Facsimile: (424) 204-9093

PATRICK OOT (*Pro Hac Vice*)

oot@shb.com

SHOOK, HARDY & BACON, L.L.P.

1800 K Street NW, Suite 1000

Washington, DC 20006

Telephone: (202) 783-8400

Facsimile: (202) 783-4211

Counsel for Defendants

UBER TECHNOLOGIES, INC.,

RASIER, LLC, and RASIER-CA, LLC

FILER'S ATTESTATION

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: January 17, 2025

By: /s/ Randall S. Luskey
Randall S. Luskey

CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2025, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Randall S. Luskey